



United States Attorney
Southern District of New York

26 Federal Plaza
New York, New York 10278

July 28, 2025

BY ECF/EMAIL

Honorable Mary K. Vyskocil
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Maximilien de Hoop Cartier, 24 Cr. 133 (MKV)*

Dear Judge Vyskocil:

The Government respectfully writes to inform the Court that a grand jury has returned a superseding indictment (the “S3 Indictment”) as to defendant Maximilien de Hoop Cartier. The S3 Indictment includes the following changes:

- The S3 Indictment charges only the defendant.
- Count One (money laundering conspiracy) of the S3 Indictment expands the time period of the prior superseding indictment (the “S2 Indictment”) from in or about May 2023 to in or about February 2024, when the defendant was arrested. The defendant had previously been charged from in or about May 2023 to in or about November 2023.
- The S3 Indictment adds a substantive money laundering charge, Count Two, with narcotics trafficking as the specified unlawful activity.
- The S3 Indictment defines the time period for Count Three (money laundering – bank fraud) (Count Two of the S2 Indictment) as being from in or about January 2020 to in or about February 2024. The defendant had previously been charged from “in or about January 2020 through the present.”
- Count Four (bank fraud) of the S3 Indictment (Count Three of the S2 Indictment) includes a more detailed “to wit” clause regarding the false statements, material misrepresentations, and material omissions the defendant made to banks to open accounts and receive/transmit funds. In addition, the S3 Indictment defines the time period for Count Four as being from in or about January 2020 to in or about February 2024. The defendant had previously been charged from “in or about January 2020 through the present.”

- The S3 Indictment does not include a charge for engaging in a monetary transaction in property derived from specified unlawful activity, which was previously charged in Count Four of the S2 Indictment.
- Count Five (operation of an unlicensed money transmitting business) of the S3 Indictment adds the definition of an unlicensed money transmitting business under 18 U.S.C. § 1960(c)(1)(C). The S3 Indictment defines the time period for Count Five as being from in or about January 2020 to in or about February 2024. The defendant had previously been charged from “in or about January 2020 through the present.”

The charges underlying the S3 Indictment are based on the same discovery as the S2 Indictment. Therefore, the Government does not need to produce any new discovery materials as a result of the S3 Indictment. In addition, in the Government’s opinion, the S3 Indictment does not affect the previously scheduled trial date of November 17, 2025.

The Government has informed defense counsel of the S3 Indictment and the above-described changes. The Government understands that the parties are available for an arraignment on Wednesday, July 30 before 3:00 p.m. or anytime on Thursday, July 31. Of course, if needed, the parties can provide additional dates to the Court.

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

by: /s/
Jennifer Ong
Eli Mark
Assistant United States Attorney
(212) 637-2224/-2431

cc: Kate Cassidy, Esq. (via ECF)